

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

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<b>UNITED STATES OF AMERICA</b>	:	
	:	
vs.	:	<b>4:24-CR-1</b>
	:	
<b>JAYQUAN ALLEN JONES</b>	:	
	:	
Defendant.	:	<b>Honorable Elizabeth W. Hanes</b>
	:	

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**SUPPLEMENT TO MEMORANDUM IN AID OF SENTENCING**

Mr. Jones writes to supplement his Memorandum in Aid of Sentencing with previously undisclosed exculpatory evidence and to ensure that the exculpatory evidence is in the record of this case.

1. As discussed in Mr. Jones’s Response to Sentencing Position of the United States, “[t]he government relies heavily on allegations that are made *only* by [REDACTED].” Doc. 177 at 5.

2. Mr. Jones has pointed out that although [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. [REDACTED]

[REDACTED]

4. [REDACTED]
5. Mr. Jones has made his interest in [REDACTED] credibility clear through both his filings and a specific *Brady* request to the government.
6. On January 28, 2025, in response to an inquiry from the Court, the government provided both the Court and Mr. Jones with photographs shown to [REDACTED] at his first interview on June 28, 2024.
7. The photographs conclusively demonstrate that the person who made aggravating statements to [REDACTED] if *anyone* in fact made such statements to [REDACTED], which is by no means a foregone conclusion—was *not* Jayquan Jones.
8. [REDACTED]
9. [REDACTED]
10. In the now-disclosed photograph, attached as Exhibit 16 to this Supplement,<sup>1</sup> Jayquan Jones stands on the far right wearing a black jacket.
11. [REDACTED]

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<sup>1</sup> To prevent confusion, this Supplement uses the same exhibit numbering used in the underlying police report.

[REDACTED]

12. In the now-disclosed photograph, attached as Exhibit 17 to this Supplement, Jayquan Jones stands on the far left wearing a black jacket without a shirt.

13. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14. In the now-disclosed photograph, attached as Exhibit 19 to this Supplement, Jayquan Jones stands on the far left wearing the black jacket. Thus, by [REDACTED] own statements, he is *not* the person “who told [REDACTED] the details regarding Mitchell’s murder.”

15. This exculpatory evidence further confirms that Jayquan Jones did not make the claimed aggravating statements to [REDACTED].

16. Mr. Jones reiterates his request that the Court strike ¶ 14 of the PSR, and not rely on the government’s arguments that are based solely on [REDACTED] claims.

Respectfully submitted,  
**JAYQUAN ALLEN JONES**

s/ Bernadette Donovan

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### **CERTIFICATE OF SERVICE**

I, Bernadette Donovan, Esq., hereby certify that on this January 29, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record. A Notice of Electronic Filing will be served on:

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